

Exhibit 28

AFFIDAVIT and DECLARATION OF CAROL CUTLER


CAROL CULTER, being duly sworn, declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am a resident of North Huntingdon Township, Pennsylvania, in Westmoreland County.
2. I voted in the 2016 general election, in the 6th ward, 3rd precinct.
3. I cast my ballot on a touch-screen electronic voting machine that had no paper ballot or receipt for me to review. As such, I cannot be sure that my vote was accurately recorded and counted.
4. I submit this affidavit/declaration to explain the hurdles I have faced in trying to seek a recount of votes in Westmoreland County.
5. Around 8:30 a.m. on November 28, 2016, I called the Westmoreland County Board of Elections to check whether the Board would be able to accept petitions seeking a recount of the vote.
6. The employee at the Board of Elections refused to answer whether it would receive petitions, and referred my inquiry to the County solicitor's office.
7. The County Solicitor gave me no guidance as to whether and where I could serve petitions for a recount. Instead, the solicitor told me only that I needed to seek advice from an attorney.
8. I was not able to file any petitions.
9. There was no notice or guidance available to the public when and where voters could submit petitions for a recount of the vote. When I called for more information, no one could provide me any guidance, telling me to consult with an attorney.

10. The system does not allow an ordinary voter, unassisted by a lawyer, to vindicate her statutory right to request a recount of the vote.

11. I am concerned that my vote and the votes of my fellow citizens were not counted accurately in the election, and would like a manual recount of every paper ballot and a forensic examination of the electronic voting systems in Pennsylvania to make the vote had integrity and every vote counted.

Dated: December 3, 2016
WESTMORELAND COUNTY, Pennsylvania



CAROL CUTLER

Sworn to and subscribed before me
this ____ day of _____, 2016.

NOTARY PUBLIC